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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

AMOS DAVIS, individually,

Plaintiff,

v.

ALLO COMMUNICATIONS LLC, a Foreign
Limited-Liability Company; RICARDO
CONTRERAS; DOES I through XX and ROE
BUSINESS ENTITIES I through XX,
inclusive,

Defendants.

CASE NO.: 2:25-CV-00802-CDS-EJY

**~~PROPOSED~~ DISCOVERY PLAN
AND SCHEDULING ORDER**

Defendants ALLO COMMUNICATIONS LLC (“Allo”) and RICARDO CONTRERAS (collectively, “Defendants”), by and through their attorneys of record, HALL & EVANS, LLC, and Plaintiff AMOS DAVIS, by and through their attorneys of record, RICHARD HARRIS LAW FIRM, hereby submits their Discovery Plan and Scheduling Order pursuant to Fed. R. Civ. P. 26(f)(3) and LR 26-1(e).

1. PROCEDURAL HISTORY

On March 20, 2025, Plaintiff commenced this action in the Eighth Judicial District Court, Clark County, Nevada by filing the Complaint. On April 2, 2025, Defendant Allo was served with a Summons and Complaint in this matter. On April 3, 2025, Defendant Ricardo Contreras

1 was served with a Summons and Complaint in this matter. On May 7, 2025, Defendants filed a
2 Notice for Removal based on diversity jurisdiction and Answer in the United States District
3 Court, District of Nevada. On May 8, 2025, the Court issued a Minute Order instructing the
4 Defendant to file a Statement Regarding Removal by May 23, 2025 and requesting a Joint Status
5 Report regarding the removed action by June 7, 2025. On May 20, 2025, Plaintiff filed a Motion
6 to Remand to State Court. On May 21, 2025, Plaintiff filed a Certificate of Interested Parties. On
7 May 21, 2025, Defendant filed a Certificate of Interested Parties. On June 3, 2025, Defendants
8 filed their Response to Plaintiff's Motion to Remand to State Court. On June 4, 2025, the case
9 was removed to the United States District Court, District of Nevada. On June 4, 2025, the parties
10 filed their Joint Status Report to the Court. On June 6, 2025, Plaintiff filed her Reply to
11 Defendant's Response to Plaintiff's Motion to Remand to State Court.
12

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14 **2. RULE 26(f) CONFERENCE**

15 The Rule 26(f) conference was held on June 3, 2025. Appearing were Austin R. Wood,
16 counsel for the Plaintiff, and Adam Knecht, Esq., counsel for Defendants.

17 **3. RULE 26(a)(1) DISCLOSURES**

18 Defendants served their Initial Disclosures on June 18, 2025. Plaintiff will serve his
19 Initial Disclosures within 14 days of the Rule 26(f) Conference.
20

21 **4. DISCOVERY SCOPE AND LIMITS**

22 The parties may conduct discovery on all issues, claims and defenses raised by the
23 pleadings filed in this matter, and any other matters reasonably calculated to lead to the
24 discovery of admissible evidence, including discovery regarding the subjects of liability,
25 causation, and damages. The presumptive limits of 10 depositions and 40 interrogatories per side
26 are appropriate. The parties agree that at this time discovery does not need to be conducted in
27 phases or otherwise limited or focused.
28

1 **5. ORDERS THAT THE COURT SHOULD ISSUE**

2 There are no orders that the Court should issue under FRCP 26(c), FRCP 26(b), or FRCP
3 16(c) at this time.

4 **6. DISCOVERY OF ELECTRONICALLY STORED INFORMATION**

5 No issues regarding electronically stored information have been identified at this time.

6 **7. ISSUES CONCERNING HANDLING CLAIMS OF PRIVILEGE**

7 The parties anticipate Defendants will seek a protective order for documents obtained
8 during discovery, and that Plaintiff will stipulate to same.

9 **8. DISCOVERY SCHEDULE**

10 The parties propose the following discovery schedule.

11 A. **Deadline for Amending Pleadings/Adding Parties:** August 11, 2025.

12 B. **Expert Disclosures:** The parties shall disclose all expert witnesses and reports
13 required by Rule 26(a)(2) no later than September 8, 2025. The parties shall disclose all rebuttal
14 expert witnesses and reports no later than October 8, 2025.

15 C. **Interim Status Reports:** The parties shall file the interim status report required
16 by LR 26-3 no later than September 8, 2025.

17 D. **Discovery Cut-Off:** The parties shall complete all discovery before November 7,
18 2025.

19 E. **Dispositive Motions:** Dispositive Motions shall be filed no later than December
20 8, 2025.

21 F. **Joint Pretrial Order:** The Joint Pretrial Order shall be filed no later than January
22 7, 2026 in the event no dispositive motions are filed. In the event dispositive motions are filed,
23 the Joint Pretrial Order shall be filed thirty days after the Court's decision on such motion(s).

24 G. **Rule 26(a)(3) Disclosures:** The parties shall make all disclosures required by
25
26
27
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Rule 26(a)(3) not later than thirty (30) days prior to trial, which shall be included, along with any objections thereto, in the Joint Pretrial Order.

H. Extensions or Modifications of the Discovery Plan and Scheduling Order:

All motions or stipulations to extend a deadline set forth in a discovery plan shall be received by the Court no later than twenty-one (21) days before the expiration of the subject deadline.

10. TRIAL ESTIMATE

The parties estimate the trial in this case will last approximately 5-7 days.

Respectfully Submitted:

Dated: June 20, 2025

Dated: June 20, 2025

RICHARD HARRIS LAW FIRM

HALL & EVANS, LLC

/s/ Austin R. Wood
AUSTIN R. WOOD, ESQ.
Nevada Bar No. 16026
Attorneys for Plaintiff

/s/ Adam R. Knecht
ADAM R. KNECHT, ESQ.
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Attorneys for Defendants

Pursuant to the foregoing, IT IS SO ORDERED.

DATED June 23, 2025.



U.S. MAGISTRATE JUDGE

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